

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Hohman Plating and Manufacturing, LLC.
814 Hillrose Avenue
Dayton, OH 45404**

ATTENTION:

**Tom Banks
Environmental Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Hohman Plating and Manufacturing, LLC. (Hohman Plating or you) to submit certain information about the facility at 814 Hillrose Avenue, Dayton, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Hohman Plating owns and operates an emission source at the Dayton, Ohio facility. We are requesting this information to determine whether your emission source is complying with the National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks found at 40 C.F.R. Part 63, Subpart N (NESHAP N) and the National Emissions Standards for Hazardous Air Pollutants: Area Source Standards

for Plating and Polishing Operations found at 40 C.F.R. Part 63, Subpart WWWWWW (NESHAP 6W).

Hohman Plating must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Hohman Plating must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."


This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Hohman Plating to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Cindy Schafer at 312-353-3018 or Sara Loiacono at 312-353-9199.

6/30/16
Date


Edward Nam
Acting Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 C.F.R. § 63.341), or National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (40 C.F.R. § 63.11511).

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term “potential to emit” shall mean the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated

as part of its design if the limitation or the effect it would have on emissions is federally enforceable.

4. The term “emission unit” shall mean any building, structure, facility, operation, installation, or other physical facility, or real or personal property that emits or may emit any air pollutant.
5. The term “plating and polishing metal HAP” shall mean any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in elemental form, with the exception of lead. Any material that does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) or manganese in amounts greater than or equal to 1.0 percent by weight (as the metal) as reported on the Material Safety Data Sheet or similar documentation for the material, is not considered to be a plating and polishing metal HAP.
6. The term “flash electroplating” or the term “short-term plating” shall mean an electroplating process that uses or emits any of the plating and polishing metal HAP and is used no more than 3 cumulative minutes per hour or 1 hour cumulative per day.
7. The term “temporary thermal spraying” shall mean a thermal spraying operation that uses or emits any of the plating and polishing metal HAP and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.
8. The term “add-on air pollution control device” means equipment installed in the ventilation system of a chromium electroplating and anodizing tanks for the purposes of collecting and containing chromium emissions from the tank(s).
9. The term “air pollution control technique” means any method, such as an add-on air pollution control device of a chemical fume suppressant, that is used to reduce chromium emissions from chromium electroplating and chromium anodizing tanks.
10. The term “maximum cumulative potential rectifier capacity” means the summation of the total installed rectifier capacity associated with the hard chromium electroplating tanks at a facility, expressed in amperes, multiplied by the maximum potential operating schedule of 8,400 hours per year and 0.7, which assumes that electrodes are energized 70 percent of the total operating time. The maximum potential operating schedule is based on operating 24 hours per day, 7 days per week, 50 weeks per year.

Appendix B

Information You Are Required to Submit to EPA

Hohman Plating and Manufacturing, LLC (Hohman) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. For each of the following operations, provide a list of the equipment used in the process (including manufacturer and model), the capacity of the equipment, the date(s) the equipment was installed, the date(s) the equipment was first operated, the emission control devices or emission control practices associated with each piece of equipment, the date(s) the emission control device or emission control practices were installed or implemented, and the date(s) the emissions control devices were first operated. If the facility does not operate any of the following operations, the operations do not have emissions control equipment, or the facility does not have emission control practices, state so in your response.
 - a. Electroplating other than chromium electroplating (i.e. not-chromium electroplating);
 - b. Electroless or non-electrolytic plating;
 - c. Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating;
 - d. Dry mechanical polishing of finished metals and formed products after plating or thermal spraying; and
 - e. Electropolishing.
2. For each of the operations identified in item 1 above, provide documentation supporting the emission reduction efficiency of any and all pollution control device or emission control practice used.
3. In electronic spreadsheet form, provide calculations used to determine monthly and 12-month rolling sum actual emissions of cadmium, chromium, lead, manganese and nickel from each of the processes identified in item 1 above for the calendar years 2011 through 2016. Include references for all emission factors used; explanations for any and all assumptions, and example calculations.
4. For each of the operations identified in item 1 above, provide the percent by weight, as used, of the following metal HAPs for any and all process materials: cadmium, chromium, lead, manganese, and nickel. Provide supporting documentation, such as safety data sheets, showing the plating and polishing metal HAP content of the process materials. Include an explanation of how each process material is used including, but not limited to, its purpose in the process, the quantity used per batch, and the process equipment in which it is used/applied.

5. For any and all non-cyanide electroplating, electroforming, or electropolishing tanks (electrolytic process tanks), provide the following information:
 - a. Indicate whether a wetting agent/fume suppressant is used in the bath. If one is used, provide the name and manufacturer of the wetting agent/fume suppressant;
 - b. If a wetting agent/fume suppressant is used, provide the amounts of the wetting agent/fume suppressant used;
 - c. Indicate if the electrolytic process tank is a batch or continuous process tank;
 - d. Indicate whether the electrolytic process tank is covered. If the electrolytic process tank is covered, provide the percent of the effective surface area that is covered; and
 - e. Provide the pH of the bath for each tank.
6. For any and all flash or short-term electroplating tanks, provide the cumulative plating time per tank in hours per day or in minutes per hour from July 1, 2011 to present.
7. For any and all electroplating tanks that use cyanide in the plating bath, provide the pH of the plating bath for each tank.
8. For any and all thermal spraying operations, provide the amount of time the thermal spraying occurred each day from July 1, 2011 to present, and where it was conducted.
9. For the following management practices, indicate if the facility implements the management practice, the date the facility implemented the management practice, whether the facility continues to implement the management practice, the equipment where the management practice is implemented, and a description of how the facility implements the management practice.
 - a. Minimize bath agitation when removing any parts processed in the tank;
 - b. Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank, using drain boards (also known as drip shields), or withdrawing parts slowly from the tank;
 - c. Optimize the design of barrels, racks, and parts to minimize dragout of bath solution;
 - d. Use tank covers;
 - e. Minimize or reduce heating of process tanks;
 - f. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with plating and polishing process equipment;
 - g. Minimize bath contamination;
 - h. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks;
 - i. Perform general good housekeeping;
 - j. Minimize spills and overflow of tanks;
 - k. Use squeegee rolls in continuous or reel-to-reel plating tanks; and

1. Perform regular inspections to identify leaks and other opportunities for pollution prevention.
10. Provide a detailed description of each chromium electroplating tank located at the facility. The description should include, at minimum, the following information:
 - a. The name or number assigned by Hohman for each tank as well as the number assigned by Ohio Environmental Protection Agency (OEPA);
 - b. The date that each tank began operation at the facility;
 - c. Uses of each tank, including a detailed description of the process in which each tank is used;
 - d. A complete list and description of each add-on air pollution control device(s) or air pollution control technique(s) used for each tank. The description must include, at minimum:
 - i. Manufacturer name or model number of the control device;
 - ii. Manufacturer name and MSDS for all wetting agents and/or fume suppressants used from July 1, 2011 to present; and
 - iii. The operating procedures for all control devices and techniques.
11. Provide copies of all records of surface tension readings for each chrome tank at the facility from July 1, 2011 to present. Include a description of whether a stalagmometer or tensiometer was used to collect these readings.
12. Provide the following information regarding each scrubber at the facility:
 - a. The emission unit(s) controlled by the scrubber;
 - b. Pressure drop, liquid flow rate, and liquid pH records for each scrubber from July 1, 2011 to present; and
 - c. A table of all performance tests conducted for any reason, from July 2006 to present. Performance testing includes, but is not limited to, compliance testing, engineering testing, stack testing, capture efficiency testing, and testing for general information.
13. Provide copies of all reports from tests conducted of the chromium air emissions from each tank for the purpose of demonstrating compliance with 40 C.F.R. Part 63, Subpart N. This includes, but is not limited to, the report for which the operating parameter value of pressure drop across each control system was determined.
14. In electronic spreadsheet form, provide calculations used to determine actual hourly and annual emissions of chromium from each chrome plating tank at the facility for the calendar years 2011 through 2016. Include references for all emission factors used, explanations for any and all assumptions, and example calculations.
15. Provide all records and corresponding documentation related to determination of the facility's maximum cumulative potential rectifier capacity (amp-hr/yr), including any subsequent revisions.

16. Provide actual cumulative rectifier capacity at the facility, including monthly and rolling 12-month totals, from July 1, 2011 to present.
17. Copies of all Initial Notification Reports submitted to EPA for each affected source at the facility, as required under 40 C.F.R. § 63.347(c) and 40 C.F.R. § 63.11509(a), as well as the date(s) on which these reports were submitted.
18. Copies of all Notification of Compliance Status Reports required under 40 C.F.R. § 63.347(e) and under 40 C.F.R. § 63.11509(b), as well as the date(s) on which the reports were submitted and the agency or agencies to which the reports were submitted.
19. Copies of all annual certifications prepared and/or submitted along with any deviation reports required under 40 C.F.R. § 63.11509(c), 40 C.F.R. § 63.342(b)(1)(ii) and 40 C.F.R. § 63.347(h), as well as the date(s) on which the certifications were prepared and/or submitted and the agency or agencies to which the certifications were submitted.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Tom Banks, Environmental Manager
Hohman Plating and Manufacturing, LLC
814 Hillrose Avenue
Dayton, OH 45404

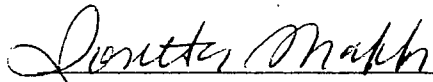
I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Bob Hodanbosi
Chief, Division of Air Pollution Control
Bob.Hodanbosi@epa.ohio.gov

and

Jenny Marsee
Regional Air pollution Control Agency
marseejs@rapca.org

On the 30 day of June 2016.



Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1480 0000 7646 9203